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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF WASHINGTON**

10 **UNITED STATES,**

11 **No. 20-cr-00068-RMP**

12 **Plaintiff,**

13 **SENTENCING MEMORANDUM**

14 **v.**

15 **BRIAN D. KNIGHT**

16 **Defendant.**

1 At four years old, Brian Knight suffered a massive stroke. It left him partially
2 paralyzed on the left side of his body. His left arm permanently curled, his brain,
3 injured. At twenty-two, he suffered another, increasing the damage to his body and
4 brain. When the epileptic episodes hit, he would often fall, causing multiple
5 concussions. The diabetes causes swelling in his feet, but is controlled by oral
6 medication. He has carpal tunnel syndrome and his eyes are weakening.

7 Brian Knight is physically and mentally vulnerable. He experiences anxiety,
8 depression, extreme stress and lives with autism. He does not need, nor should he
9 receive a lengthy prison sentence. He has been on pretrial release with strict
10 conditions for over two years. He has not had a single pretrial violation.

11 “Sending an offender to prison isn’t a very effective way to deter crime.
12 Prisons are good for punishing criminals and keeping them off the street, but prison
13 sentences are unlikely to deter future crimes. Prisons actually may have the
14 opposite effect.”¹

15 “[T]here is little evidence of a specific deterrent effect arising from the
16 experience of imprisonment compared with the experience of noncustodial
17 sanctions such as probation. Instead, the evidence suggests that reoffending is

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1 ¹ National Institute of Justice, *Five Things About Deterrence*, <http://www.nij.gov/five-things/pages/deterrence.aspx>

1 either unaffected or increased.”²

2 Mr. Knight asks for a three-year term of imprisonment and to be supervised
3 for the rest of his life.

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5 Dated: June 17, 2022

6 Federal Defenders of Eastern Washington & Idaho

7 *s/Andrea K. George*

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19 **SERVICE CERTIFICATE**

20 I certify that on June 17, 2022, I electronically filed the foregoing with the
21 Clerk of the Court using the CM/ECF System, which will notify Assistant
22 United States Attorneys: David Herzog.

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24 *s/Andrea K. George*

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31 ² Daniel S. Nagin, *Deterrence in the Twenty-First Century*, 42 Crime & Just. 199, 201 (2013).